

KENTUCKY TITLE I COMPARABILITY GUIDE

2008-09 School Year

**Kentucky Department of Education
Division of Federal Programs and Instructional Equity**

502-564-3791

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I. INTRODUCTION

Section 1120A of Title I of the *No Child Left Behind Act of 2001* states that a district may receive Title I, Part A funds only if general (State and local) funds will be used in schools served by Title I to provide services, that, taken as a whole, are at least comparable to services in schools that are not receiving Title I funds. Title I schools must receive comparable services without taking into account Title I funds allocated, so that **all children are receiving essentially the same per pupil expenditures from general funds**. Schools receiving Title I services must be comparable to non-Title I schools. When all schools are served by Title I, their state and locally funded services must be comparable to each other. Comparability procedures must be implemented annually.

The comparability requirement does NOT apply to a district that has only one school for each grade span. A district may exclude schools with 100 or fewer students from its comparability determinations. All districts must complete Worksheet 1 (even those districts with one school for each grade span).

This guidebook has been developed to assist the local district in completing its comparability report. The guidebook begins by discussing what the law requires about comparability. It then describes ways comparability may be documented.

The comparability worksheets are a part of a workbook (Excel spreadsheet) and must be completed electronically. Complete the applicable comparability worksheets by November 7, 2008 and email the entire workbook (with the name of the district and Comparability in the Subject line) to title1reports@education.ky.gov . Keep the worksheets and backup data on file in the district Title I office to be reviewed by Title I, Part A staff during monitoring visits. Demonstrating comparability is a requirement that districts must meet to receive Title I, Part A funds.

If you have questions as you complete the worksheets, or if any Title I school in the district is **not** comparable after you have completed the applicable worksheets, please call the Title I Consultant assigned to your district (Jennifer Baker, David Millanti, Jaynae Laine, Charlie Lewis, Mary Marshall, Dawn Offutt, Andrea Carter, Laura Graham) or Ava Taylor or Debbie Hicks for assistance at (502) 564-3791.

II. REQUIREMENTS OF TITLE I, Part A

Public Law 107-110, Section 1120A

A district may receive Title I funds only if it uses general funds (state and local funds) to provide services in Title I schools that are at least comparable to the services provided in non-Title I schools. If the district serves all of its schools (or all of its schools in a grade span or size grouping) with Title I funds, the district must use general funds to provide services that are comparable in each school. Comparability procedures must be implemented annually.

The comparability requirement does NOT apply to a district that has only one building for each grade span. A district may exclude schools with 100 or fewer students from its comparability determinations. All district must complete Worksheet 1 (even those districts with one school for each grade span).

Title I requires that each district give written assurances that schools within the district receive comparable services from general funds. These assurances state that the district must meet the comparability requirements by establishing and implementing a:

- (a) Districtwide salary schedule;
- (b) Policy to ensure equivalence among schools in teachers, administrators, and other staff; **and**
- (c) Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

The comparability worksheets determine compliance with comparability. The district must complete the general information section of the comparability report (Worksheet 1). If the general information section (Worksheet 1) indicates that a study must be completed, the district has the option of documenting compliance by utilizing **one** of the following two ways:

- (1) Using **Worksheet 2**, compare the average number of students per instructional staff in each Title I school with the average number of students per instructional staff in non-Title I schools. A Title I school is comparable if its average does not exceed 110 percent of the average of non-Title I schools. If all schools in a grade span or size grouping are served by Title I, higher poverty Title I schools are compared to lower poverty Title I schools.

OR

- (2) Using **Worksheet 3**, compare the average instructional staff salary expenditure per student in each Title I school with the average instructional staff salary expenditure per student in non-Title I schools. A Title I school is comparable if its average is at least 90 percent of the average of non-Title I schools. If all schools in a grade span or size grouping are served by Title I, higher poverty Title I schools are compared to lower poverty Title I schools.

This guide contains both worksheets. Since Worksheet 2 is by far the easier of the two worksheets to complete, it is suggested that Worksheet 3 (Instructional Staff Salaries) be completed **only** if comparability cannot be shown using Worksheet 2 (Student/Staff Ratio). In that case the district may want to complete Worksheet 3 before moving or adding staff to make the schools comparable. Call the consultant assigned to your district at (502) 564-3791 if the worksheet shows that any school in the district is not comparable or if you have questions.

If Worksheet 1 . . .	Then you must . . .
1. Indicates that there is only one school for each grade span . . .	1. Complete Worksheet 1 only and submit the entire workbook with Worksheet 1 completed by Nov. 7, 2008 to title1reports@education.ky.gov
2. Indicates that in all grade spans there is only one school in each size grouping . . .	2. Complete Worksheet 1 only and submit the entire workbook with Worksheet 1 completed by Nov. 7, 2008 to title1reports@education.ky.gov
3. Indicates that for any grade there is a size grouping with both Title I and non-Title I schools . . .	3. Complete Worksheet 1 to determine which Worksheet(s) 2 must be completed. Submit the entire workbook with Worksheet 1 and applicable Worksheet(s) 2 completed by Nov. 7, 2008 to title1reports@education.ky.gov
4. Indicates that for any grade span there is a size grouping with more than one Title I school . . .	4. Complete Worksheet 1 to determine which Worksheet(s) 2 must be completed. Submit the entire workbook with Worksheet 1 and applicable Worksheets) 2 completed by Nov. 7, 2008 to title1reports@education.ky.gov
Include the name of the district and Comparability in the Subject line of the email to: title1reports@education.ky.gov	

III. Worksheet 1

General Information to Document Comparability

The purpose of this worksheet is to determine whether or not a detailed comparability study using Worksheet 2 must be completed, and, if so, the number of such reports required.

INSTRUCTIONS FOR COMPLETING WORKSHEET 1

- STEP 1: Enter data/information into yellow cells only. Do **not** enter data/information into white cells.
- STEP 2: Enter the name of the district and the person responsible for completing the comparability study. Enter the date of the data used for the report. The information for the comparability study must be taken on the last day of the second school month (a school month is twenty teaching days) or another date early in the school year (on or before October 31, 2008).
- STEP 3: A district may meet the comparability requirements on a grade-span by grade-span basis or a school-by-school basis. **(Data from a school with an enrollment of 100 or fewer children is not required.)** If grade span grouping is used, group schools according to grade span. Although there is no limitation on the number of grade spans a district may use, the number should match the basic organization of schools in the district. Usually there are three groups – (A) elementary, (B) middle or junior high, and (C) senior high. **Every school with an enrollment over 100 must be assigned to one of the groups.** A fourth or "D" group is permitted (for example, primary schools or schools with eight or more grades above kindergarten). Do not include preschool centers.

Follow these rules in grouping schools:

- (a) A school serving grades in two or three of the grade span groupings is to be included in that group with which it has the greatest number of grades in common.
- (b) A school that serves an equal number of grades in two or more grade span groupings is to be included in the lower grade span grouping.
- (c) An additional group (D group) is permitted (for example, primary schools or schools with eight or more grades above kindergarten).

- STEP 4: If there is a significant difference in the enrollments of schools within a grade span – for example, the largest school in the grade span has an enrollment that is two times the enrollment of the smallest school in the grade span – the district may divide grade spans into a smaller size grouping and a larger size grouping. Any school whose enrollment falls between the two can be placed in the size group that is most appropriate.

The example on page 5 shows that there are Title I and non-Title I schools in the Grade Span A-Larger Size Grouping. Therefore, a detailed comparability study must be completed. The study (using Worksheet 2-A-L) compares the Title I schools to the non-Title I schools within Grade Span A-Larger Size Grouping.

The example on page 6 shows that there is more than one school in Grade Span A-Smaller Size Grouping, and all are being served by Title I. Therefore, a detailed comparability study must be completed. The study (using Worksheet 2-A-S) compares the higher poverty Title I schools to the lower poverty Title I comparison schools within Grade Span A-Smaller Size Grouping.

- STEP 5: If it has been determined from Worksheet 1 that a further comparability study has to be completed, Parts IV and V of this guide explain the procedures to complete Worksheet 2. A study must be completed if there is more than one school in a grade span or size grouping. **Use a separate Worksheet 2 for each grade span or size grouping containing more than one school.** Do **not** use Worksheet 3 unless you cannot show that the schools are comparable using Worksheet 2. Part VI of the guide explains the procedures to complete Worksheet 3 if it is needed.

NOTE: A further comparability study using Worksheet 2 must be completed only if Title I schools can be compared to each other (in Column C) or with non-Title I schools (in Column D). No study will be made across grade spans or size groupings. (See example on page 7.)

TITLE I COMPARABILITY REPORT FOR 2008-09

General Information to Document Comparability

District Name: Kentucky County

Responsible Official: Henry Jones

Date of Data Used: 10/15/2008

Use either last day of second school month or another date early in school year (on or before Oct. 31, 2008).

>If the district has only one school per grade span, complete Worksheet 1 only.

>Schools with 100 or fewer students may be excluded from comparability determinations. List schools excluded:

>Schools within a grade span may be divided into smaller and larger size grouping if the largest school in the grade span has an enrollment that is 2 times the enrollment of the smallest school in the same grade span.

*>If a grade span is **not** divided into size groups, enter all schools as "smaller."*

PUBLIC SCHOOLS ENROLLING MORE THAN 100 CHILDREN

Grade Spans Column A	Size Grouping Column B	# of Title I Schools Column C	# of Non-Title I Schools Column D
Grade Span A =	Smaller	1	
P-5	Larger	5	3
Grade Span B =	Smaller		1
6-8	Larger		
Grade Span C =	Smaller		1
9-12	Larger		
Grade Span D =	Smaller		
	Larger		
TOTALS:		6	5

In this example, a small school in the P-5 grade span was pulled out and put in the smaller size grouping. No study is necessary for Grade Span A-Smaller Size Grouping since there is no school to be compared within the smaller size grouping.

A study must be made to compare the Title I schools to the non-Title I schools within the larger size grouping in the P-5 grade span. Worksheet 2-A-L must be completed to determine if all of the schools in Grade Span A-Larger Size Grouping are comparable. The example on page 11 shows the completed Worksheet 2-A-L for the schools in Grade Span A-Larger Size Grouping.

TITLE I COMPARABILITY REPORT FOR 2008-09

General Information to Document Comparability

District Name: Kera County

Responsible Official: Jim Henry

Date of Data Used: 10/8/2008

Use either last day of second school month or another date early in school year (on or before Oct. 31,2008).

>If the district has only one school per grade span, complete Worksheet 1 only.

>Schools with 100 or fewer students may be excluded from comparability determinations. List schools excluded:

>Schools within a grade span may be divided into smaller and larger size grouping if the largest school in the grade span has an enrollment that is 2 times the enrollment of the smallest school in the same grade span.

>If a grade span is not divided into size groups, enter all schools as "smaller."

PUBLIC SCHOOLS ENROLLING MORE THAN 100 CHILDREN

Grade Spans Column A	Size Grouping Column B	# of Title I Schools Column C	# of Non-Title I Schools Column D
Grade Span A =	Smaller	8	
P-5	Larger		
Grade Span B =	Smaller	1	
6-8	Larger	1	
Grade Span C =	Smaller		2
9-12	Larger		
Grade Span D =	Smaller		
	Larger		
TOTALS:		10	2

In this example, size grouping was not used since the P-5 schools are similar in enrollment. The number of P-5 schools was placed in Grade Span A-Smaller Size Grouping since the grade span was not divided into size groups. A study must be made to compare the Title I schools in the P-5 grade span to each other. Worksheet 2-A-S must be completed to determine if the schools in the P-5 grade span are comparable. The example on page 13 shows the completed Worksheet 2-A-S when all the schools in Grade Span A-Smaller Size Grouping are served by Title I.

No studies are necessary for Grade Span B-Smaller Size Grouping and for Grade Span B-Larger Size Grouping because there are no schools to be compared within the size groupings (only one smaller middle school and only one larger middle school). **No study will be made across grade spans or size groupings.**

No study is necessary for Grade Span C-Smaller Size Grouping because the high schools are **not** Title I. A study is only done to compare Title I schools to non-Title I schools or to compare high poverty Title I schools to low poverty Title I schools.

TITLE I COMPARABILITY REPORT FOR 2008-09

General Information to Document Comparability

District Name:	Thoroughbred Co.	Responsible Official:	Henrietta Sims
Date of Data Used:	10/22/2008		

Use either last day of second school month or another date early in school year (on or before Oct. 31,2008).

>If the district has only one school per grade span, complete Worksheet 1 only.

>Schools with 100 or fewer students may be excluded from comparability determinations. List schools excluded:

Filly Ele.

>Schools within a grade span may be divided into smaller and larger size grouping if the largest school in the grade span has an enrollment that is 2 times the enrollment of the smallest school in the same grade span.

>If a grade span is not divided into size groups, enter all schools as "smaller."

PUBLIC SCHOOLS ENROLLING MORE THAN 100 CHILDREN			
Grade Spans Column A	Size Grouping Column B	# of Title I Schools Column C	# of Non-Title I Schools Column D
Grade Span A =	Smaller	1	
P-5	Larger		1
Grade Span B =	Smaller	1	
6-8	Larger	1	
Grade Span C =	Smaller		1
9-12	Larger		1
Grade Span D =	Smaller		
	Larger		
TOTALS:		3	3

In this example, no study is necessary for any grade span or size grouping. Note that a school with an enrollment of 100 or less been excluded from the study. There are no schools to be compared in grade spans or size groupings. Do **not** complete any other worksheets.

IV. WORKSHEET 2

Detailed School Data Using Student/Staff Ratio

If Worksheet 1 indicates that a detailed comparability study is needed, it is recommended that Worksheet 2 be used. On Worksheet 2, the student/staff ratio in each Title I school is compared with the student/staff ratio in non-Title I schools. If all schools in a grade span or size grouping are Title I schools, the high poverty Title I schools are compared to the low poverty Title I schools.

NOTE: If all schools in a grade span or size grouping are served by Title I, first read this section (Part IV), then follow the instructions in Part V, beginning on page 12.

F.T.E. (Full-Time Equivalency) Staff

When calculating instructional staff, be **consistent** from school to school and for Title I and non-Title I schools alike. Itinerant staff must be prorated as necessary (e.g., if the music teacher serves more than one school, the music teacher's F.T.E. is less than full-time in each school).

Instructional Staff To Be Included

State and locally funded instructional staff members **assigned to the school** who provide direct instructional services to children or who assist or supervise those staff members who provide instruction **must be included** for comparability purposes. This includes **state and locally funded** teachers, principals, librarians, guidance personnel, and paraprofessionals who are employed to assist other instructional staff members providing instructional service. (Secretaries, clerical personnel and cafeteria workers are **not** included.)

Instructional Staff To Be Excluded

The following instructional staff **must be excluded** for comparability purposes:

- Instructional staff paid from **any federal funds**, such as Title I funded teachers and paraeducators/ instructional assistants, Title II funded teachers to reduce class size, Title III funded staff; staff funded through IDEA; etc.;

The following instructional staff **may be excluded (be consistent from school to school)**:

- Instructional staff paid from **general funds** for language instruction educational programs for English language learners;
- Instructional staff paid from **general funds** for excess costs of providing services to children with disabilities as determined by the district; and
- Instructional staff paid from supplemental general funds for a program in a non-Title I school that meets the schoolwide program requirements of section 1114 or targeted assistance school requirements of section 1115. These programs must be in compliance with the requirements of a schoolwide program or a targeted assistance school.

A program funded from supplemental state or local funds meets the schoolwide program requirements of section 1114 if it—

- Is implemented in a school that meets the Title I schoolwide program poverty threshold (40% low-income);
- Is designed to upgrade the entire educational program in the school to enable all children to meet the state's challenging student performance standards;
- Is designed to meet the educational needs of all children in the school, particularly the needs of children who are failing, or most at risk of failing, to meet the state's student performance standards;
- Uses the state's system of assessment to review the effectiveness of the program.

A program funded from supplemental state or local funds meets the targeted assistance school requirements of section 1115 if it—

- Serves only children who are failing, or most at risk of failing, to meet the state's student performance standards;
- Provides supplemental services designed to meet the special educational needs of children who are participating in the program to enable those children to meet the state's student performance standards;
- Uses the state's system of assessment to review the effectiveness of the program.

INSTRUCTIONS FOR COMPLETING WORKSHEET(S) 2

A separate Worksheet 2 must be completed for each grade span or size grouping containing more than one school. Complete only the worksheets that are needed.

- *Worksheet 2-A-S is for Grade Span A-Smaller Size Grouping or if Grade Span A is not divided into size groups.*
- *Worksheet 2-A-L is for Grade Span A-Larger Size Grouping.*
- *Worksheet 2-B-S is for Grade Span B-Smaller Size Grouping or if Grade Span B is not divided into size groups.*
- *Worksheet 2-B-L is for Grade Span B-Larger Size Grouping.*
- *Worksheet 2-C-S is for Grade Span C-Smaller Size Grouping or if Grade Span C is not divided into size groups.*
- *Worksheet 2-C-L is for Grade Span C-Larger Size Grouping.*
- *Worksheet 2-D-S is for Grade Span D- Smaller Size Grouping or if Grade Span D is not divided into size groups.*
- *Worksheet 2-D-L is for Grade Span D- Larger Size Grouping.*

STEP 1: Enter data/information into yellow cells. Do **not** enter data/information into white cells.

STEP 2: At the top of the worksheet, enter the name of the district.

STEP 3: If a school council has reduced the school's instructional staff, the school must continue to receive the same amount of state or local funds. Enter the number of staff in Column D that would have been at the school. Put an * next to the school and describe the change made by the council in the yellow cell.

STEP 4: List all the schools that are Title I schools (or high poverty Title I schools) in Column A and enter the actual grade span in Column B.

STEP 5: In Column C, enter the enrollment of each Title I school at the date the study is taken. Do **not** include preschool students.

NOTE: Kindergarten students who attend school for half of the day should be counted as half-time students for enrollment purposes (.5 X 50 = 25). Preschool students should not be included in the enrollment.

STEP 6: In Column D give the number of state and locally funded instructional staff Full-time Equivalency (F.T.E.) at each Title I school. (See previous page for instructional staff to be included and excluded in calculations.)

In the example below, the total state and locally funded instructional staff F.T.E. for Pontiac Elementary School is 21.10. *Note that the itinerant teachers have been prorated.* School staff information for each school must be on file in the district Title I office.

Pontiac Elementary	
State and Locally Funded Instructional Staff	F.T.E. (Full-Time Equivalency)
1 Principal	1.00 F.T.E.
16 Regular Classroom Teachers	16.00 F.T.E.
1 Music Teacher	.33 F.T.E.
1 Art Teacher	.33 F.T.E.
1 P.E. Teacher	.33 F.T.E.
1 School Nurse	.11 F.T.E.
1 Counselor	1.00 F.T.E.
2 Full-time Paraeducators (Instructional Assistants)	2.00 F.T.E.
BUILDING F.T.E. TOTAL	21.10 F.T.E.

Title I school calculations are computed individually by dividing Column C by Column D to obtain the student/staff ratio for Column E-1. The formula has been set to calculate the ratio in Column E-1.

STEP 7: List the non-Title I schools (or the low poverty Title I schools) at the bottom of the page in the comparison group. Enter the total enrollment of students for all the comparison schools and the total number of F.T.E. staff at all of the comparison schools.

The comparison schools' average student/staff ratio (Column E-2) is computed by dividing the total enrollment by the total F.T.E. staff. The formula has been set to calculate the ratio in Column E-2. The formula has been set to copy the ratio into the Average from Col. E-2. Column E-3 is the result of multiplying 110% (1.10) times Col. E-2. The formula has been set to calculate the multiplication in Column E-3.

STEP 8: If the student/staff ratio of any Title I school (or high poverty Title I school) does **not** exceed the figure in Column E-3, type **Yes** in Column F to show that the school is comparable.

STEP 9: If the student/staff ratio of any Title I school (or high poverty Title I school) exceeds the figure in Column E-3, type **No** in Column F to show that the school is **not** comparable.

In the example on page 11, the student/staff ratios for all of the Title I schools in Column E-1 do **not** exceed 24.43 (Column E-3). Therefore, all schools in the example are considered comparable.

STEP 10: If all the schools are comparable, email the entire workbook with Worksheet 1 and the applicable Worksheets 2 completed (with the name of the district and Comparability in the Subject line) to title1reports@education.ky.gov . Keep a copy of the workbook and backup data on file in the district Title I office to be reviewed by auditors and by program staff during federal program monitoring visits.

STEP 11: If any of the Title I schools (or high poverty Title I schools) are **not** comparable using student/staff ratio, call the Title I Consultant assigned to your district at (502) 564-3791 for further guidance. After talking with the staff, you may want to complete Worksheet 3 to determine if the schools are comparable using instructional staff salaries before adding or moving staff.

STEP 12: If any of the Title I schools (or high poverty Title I schools) are **not** comparable, staff will need to be moved or added.

TITLE I COMPARABILITY REPORT FOR 2008-09

Detailed School Data using Student/Staff Ratio

District Name: **Kentucky County**

TITLE I SCHOOLS (or HIGH POVERTY TITLE I SCHOOLS)					
Title I Schools	Actual Grade Span	Students Enrolled	F.T.E. Staff (general funds)	Student/Staff Ratio Col C divided by Col D	Comparable Yes or No
Column A	Column B	Column C	Column D	Column E-1	Column F
Pontiac Ele	P-5	409	21.10	19.38	Yes
Cadillac Ele	P-6	409	18.10	22.60	Yes
Thunderbird Ele	P-6	424	20.80	20.38	Yes
Ford Ele	P-5	412	18.70	22.03	Yes
Mustang Ele	P-7	682	29.52	23.10	Yes

COMPARISON SCHOOLS (NON-TITLE I SCHOOLS OR LOW POVERTY TITLE I SCHOOLS)				
Comparison Schools	Actual Grade Span	Students Enrolled	F.T.E. Staff	Average Student/Staff Col C divided by Col D
		Total of Comparison Sch.	Total of Com. Sch.	Column E-2
Camaro Ele	P-5	1344	60.51	22.21
Pinto Ele	P-5			
Corvette Ele	P-6			
		Average from Col. E-2		Column E-3
		1.10 X E-2	22.21	24.43

This example determines if the schools in the larger size grouping from Example A on page 6 are comparable. The schools used as comparison schools in this example are non-Title I schools. All schools in this example are comparable because the student/staff ratio for each Title I school (in Column E-1) does not exceed the figure in Column E-3.

V. COMPLETING WORKSHEET 2

When All Schools Are Title I Schools

If all of a district's schools in a grade span or size grouping are Title I schools, then the district is obligated to demonstrate that state and local services, taken as a whole, are comparable in each school. In order to do this, the district must identify some schools as "Title I" schools and some as comparison schools. **Use the Title I Ranking Report for 2008-09 to identify the poverty percentage of the Title I schools.**

Use the following format in doing this:

- STEP 1: The **high poverty** schools are to be identified as the "Title I" schools and should be listed in Column A under *TITLE I SCHOOLS (or HIGH POVERTY SCHOOLS)*. Use the date available on the *Title I Ranking Report for 2008-09* to identify the high poverty schools.
- STEP 2: Those Title I schools with the **lowest percent** of children from low-income families are to be identified as the *COMPARISON SCHOOLS*. This group of comparison schools may **not** include more than one-half of all schools in that grade span or grouping.
- STEP 3: The following describes the process used to complete the example on page 13:
- (a) The grade span is P-5.
 - (b) The district will not split the grade span by size grouping. Therefore, Worksheet 2-A-S (Grade Span A-Smaller Size Grouping) would be used.
 - (c) There are eight elementary schools – all are served by Title I.
 - (d) The percent of children from low-income families must be used to determine which schools will act as the comparison schools. Using the data available on the *Title I Ranking Report for 2008-09*, identify those schools from the group with the lowest percent of low-income children.

Example

Title I Schools	% Low-Income
Red Elementary	40
White Elementary	38
Black Elementary	35
Green Elementary	34
Orange Elementary	30
Yellow Elementary	29
Blue Elementary	27
Pink Elementary	25

- STEP 4: Since there are eight Title I schools, up to four of the lowest poverty schools (one-half) may be placed at the bottom of the page as the Comparison Schools. For the example, only three schools will be used as Comparison Schools: Yellow Elementary (29%), Blue Elementary (27%) and Pink Elementary (25%).
- STEP 5: To complete Columns C, D and E on Worksheet 2-A-S, the instructions are identical to those provided in the instructions in Part IV for comparing Title I schools to non-Title I schools using student/staff ratio.

TITLE I COMPARABILITY REPORT FOR 2008-09 **Detailed School Data Using Student/Staff Ratio**

District Name: Kera County

TITLE I SCHOOLS (or HIGH POVERTY TITLE I SCHOOLS)					
Title I Schools Column A	Actual Grade Span Column B	Students Enrolled Column C	F.T.E. Staff (general funds) Column D	Student/Staff Ratio Col C divided by Col D Column E-1	Comparable Yes or No Column F
Red Ele	P-5	409	21.10	19.38	Yes
White Ele	P-6	409	18.10	22.60	Yes
Black Ele	P-6	424	20.80	20.38	Yes
Green Ele	P-5	412	18.70	22.03	Yes
Orange Ele	P-7	682	29.52	23.10	Yes

COMPARISON SCHOOLS (NON-TITLE I SCHOOLS OR LOW POVERTY TITLE I SCHOOLS)					
Comparison Schools	Actual Grade Span	Students Enrolled	F.T.E. Staff	Average Student/Staff Col C divided by Col D	
		Total of Comparison Sch.	Total of Com. Sch.	Column E-2	
Yellow Ele	P-5	1344	60.51	22.21	
Blue Ele	P-5				
Pink Ele	P-6				
		Average from Col. E-2		Column E-3	
		1.10 X E-2	22.21	24.43	

The Title I schools with the lowest **percent** of free and reduced lunch count must be used as the Comparison Schools if all schools in the grade span or size grouping are served by Title I. All schools in this example are comparable because the student/staff ratio for each Title I school (in Column E-1) does not exceed the figure in Column E-3.

VI. WORKSHEET 3

Detailed School Data using Instructional Staff Salaries

NOTE: Do not use this comparison unless schools were not comparable using Worksheet 2. Contact the Title I Consultant assigned to your district before using Worksheet 3. If all schools in a grade span or size group are served by Title I, read this part (Part VI); then follow instructions in Part V for comparison schools.

This section explains the procedures for completing Worksheet 3 when comparing the instructional staff salary expenditure per student in each Title I school with the instructional staff salary expenditure per student in schools not participating in Title I.

Salaries (Excluding Longevity)

When calculating instructional staff salaries, be consistent from building to building and Title I and non-Title I schools alike. Be sure to prorate salaries as necessary (e.g., if a music teacher is .5 F.T.E. in one elementary and .5 F.T.E. in another elementary, the salary identified for each building should only reflect that portion of the teacher's time assigned in a particular school). Salaries used for comparability purposes are to exclude longevity (i.e., length of service). Therefore, the base salary for job classification should be used - NOT current salary. The district should distinguish various levels of base salaries (e.g., teachers with a bachelor's degree would have one base salary; teachers with master's degree would have a higher base salary).

Staff To Be Included

The salaries of **state and locally funded** instructional staff members **assigned to the school** who provide direct instructional services to children or who assist or supervise those staff members who provide instruction **must be included** for comparability purposes. This includes state and locally funded teachers, principals, librarians, guidance personnel, and paraprofessionals who are employed to assist other instructional staff members providing instructional service. (Secretaries, clerical personnel and cafeteria workers are **not** included.)

Staff To Be Excluded

The salaries of the following staff **must be excluded** for comparability purposes:

- Instructional staff paid from **any federal funds** such as Title I funded teachers and paraeducators/instructional assistants, Title II funded teachers to reduce class size, staff funded through IDEA, etc.;

The following instructional staff **may be excluded (be consistent from school to school)**:

- Instructional staff paid from **general funds** for language instruction educational programs for English language learners;
- Instructional staff paid from **general funds** for excess costs of providing services to children with disabilities as determined by the district; and
- Instructional staff paid from supplemental general funds for a program in a non-Title I school that meets the schoolwide program requirements of section 1114 or targeted assistance school requirements of section 1115. (See page 8 for schoolwide program requirements and targeted assistance requirements.)

INSTRUCTIONS FOR COMPLETING WORKSHEET 3

NOTE: Do not use this worksheet unless schools were not comparable using Worksheet 3. Contact the Title I Consultant assigned to your district before using this worksheet. A separate Worksheet 3 must be completed for each grade span or size grouping containing more than one school. To make additional copies of Worksheet 3, go to Edit; Move or Copy Sheet; highlight Worksheet 3 and click on create a copy.

STEP 1: At the top of the worksheet, enter the name of the district.

STEP 2: Identify which grade span is compared on the worksheet (e.g., P-5 would be on one sheet). If the district splits any grade span by size of enrollment, then copy the worksheet as needed.

STEP 3: List all the schools that are Title I schools (or high poverty Title I schools) in Column A and give the actual grade spans in Column B.

STEP 4: In Column C enter the enrollment of each Title I school at the date the study is taken.

NOTE: Kindergarten students who attend school for half of the day should be counted as half-time students for enrollment purposes (.5 X 50 = 25). Preschool students should not be included in the enrollment.

STEP 5: In Column C give the total salaries excluding longevity at each Title I school. For each Title I school, the district compiles the total salary expenditure by building. In the example on page 16, the total staff F.T.E. for Red Elementary School equals \$376,298.

Red Elementary		
Staff	Base Salary Per Classification	Total Salary (Prorated)
1 Principal	\$25,000	\$25,000
10 Regular Classroom Teachers (Master's)	\$20,000	\$200,000
6 Regular Classroom Teachers (Bachelor's)	\$18,000	\$108,000
1 Music Teacher (.333 F.T.E.)	\$20,000	\$6,660
1 Art Teacher (.333 F.T.E.)	\$20,000	\$6,660
1 P.E. Teacher (.333 F.T.E.)	\$18,000	\$5,994
1 School Nurse (.11 F.T.E.)	\$15,000	\$1,650
1 Counselor	\$8,000	\$8,000
2 Full-time Paraeducators (Instructional As.)	\$7,167	\$14,334
BUILDING F.T.E. TOTAL		\$376,298

Title I school calculations are computed individually by dividing Column D by Column C. The formula has been set to calculate the average per pupil expenditure in Column E-1.

STEP 6: List the comparison schools at the bottom of the page. Enter the total enrollment of students in comparison schools and the total salaries at the comparison schools.

The comparison schools' average per pupil expenditure is computed by dividing the total salaries by the total enrolled. This computation results in the average per pupil expenditure for the non-Title I schools. The formula has been set to calculate 90% of Column E-2 and enter the figure in Column E-3.

STEP 7: If the average per pupil expenditure for any Title I school (or high poverty Title I school) is more than the figure in Column E-3, enter **Yes** in Column F to show that the school is comparable. If the average per pupil expenditure for any Title I school (or high poverty Title I school) is less than the figure in Column E-3, enter **No** in Column F to show that the school is not comparable. In the example on page 16, each Title I school's average per pupil expenditure in Column E-1 exceeds \$766.63 (Column E-3). Therefore, all schools in the example are considered comparable.

NOTE: If any school is not comparable, staff will have to be added or moved in order to make the school comparable.

TITLE I COMPARABILITY REPORT FOR 2008-09 **Detailed School Data using Instructional Staff Salaries**

District Name: **Kera County**

TITLE I SCHOOLS (or HIGH POVERTY SCHOOLS)					
Title I Schools	Actual Grade Span	Students Enrolled	Salaries Ex. Longevity	Per Pupil Expenditure Col D divided by Col C	Comparable Yes or No
Column A	Column B	Column C	Column D	Column E-1	Column F
Red Ele	P-5	409	\$376,298	920.04	Yes
White Ele	P-6	409	\$343,400	839.61	Yes
Black Ele	P-6	474	\$396,738	837.00	Yes
Green Ele	P-5	412	\$360,269	874.44	Yes
Orange Ele	P-7	682	\$566,961	831.32	Yes

COMPARISON SCHOOLS (NON-TITLE I SCHOOLS or LOW POVERTY TITLE I SCHOOLS)					
Comparison Schools	Actual Grade Span	Students Enrolled Total of Comparison Sch.	Salaries Total of Com. Sch.	Average Per Pupil Exp Col D divided by Col E	
				Column E-2	
Yellow Ele	P-5	1344	\$1,144,833	851.81	
Blue Ele	P-5				
Pink Ele	P-6				
		Enter Average from Col. E-2		Column E-3	
		.90 X E-2	851.81	766.63	

This example determines if the schools in the smaller size grouping from the example on page 6 are comparable using staff salaries instead of staff/student ratio. The Title I schools with the lowest percentage of free and reduced lunch count must be used as the comparison schools when all of the schools in the grade span or size grouping are served by Title I. All schools in this example are comparable because the average per pupil expenditure for each school (in Column E-1) exceeds the amount in Column E-3.

VII. DATES, RECORDS, AND ACTION IN COMPARABILITY REPORTING

It is the district's **responsibility** to maintain appropriate records that verify that the comparability requirement is met. Email the entire workbook with Worksheet 1 and the applicable Worksheet(s) 2 (with the name of the district and Comparability in the subject line) by November 7, 2008 to title1reports@education.ky.gov . Keep a copy of the completed worksheets and backup data on file in the district Title I office.

A. District Comparability

1. The effective date of the comparability report should be the last day of the second school month or another date early in the school year (on or before October 31, 2008). Data is to reflect the current year program at the date selected.
2. A district must be in compliance with comparability following the comparability study.

B. Information and Records on File in Local District

1. The entire workbook with the completed worksheets must be emailed by Nov. 7, 2008 to title1reports@education.ky.gov .
2. All districts must complete Worksheet 1. The district must use the applicable Worksheet(s) 2 if further comparability studies are required. Only use Worksheet 3 if schools are **not** comparable using Worksheet 2. Call the Title I Consultant assigned to your district at (502) 564-3791 before using Worksheet 3.
3. The worksheets must be available in the district Title I office for monitoring along with the districtwide salary schedule; policy to ensure equivalence among schools in teachers, administrators, and other staff; and policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.
4. The district must have the working papers on file for each school. This includes the staff included and excluded for the report or the salary information for the report.
5. Comparability records must be maintained in the district for three years or until any impending audit is settled.

C. Actions in Cases of Non-Comparability

1. **Demonstrating comparability is a requirement for receiving Title I, Part A funds.** If a district determines that **any** Title I school is **not** comparable, records must be made available to show how the district has brought the schools into comparability. Call the Title I Consultant assigned to your district at (502) 564-3791 if the study shows that **any** Title I school is not comparable. **Staff will need to be moved or added immediately in order to make the particular school(s) comparable.**
2. A new Comparability Report and documentation showing that staff have been added/moved must then be submitted to the KY Department of Education. Title I funds will be held until the documentation is submitted.
3. If a district is found **not** to be in compliance with the comparability requirements, the district must **pay back** the Title I school that was **not** comparable. The amount of general (state and federal) funds to be paid back to the school is determined by the percentage by which the school was not comparable.